

Exhibit 5

(REDACTED)

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

1
2 IN THE UNITED STATES DISTRICT COURT
3 MIDDLE DISTRICT OF GEORGIA
4 COLUMBUS DIVISION

5
6 Civil Action File No. 4:18-cv-00070-CDL

7 WILHEN HILL BARRIENTOS, et al.,

8 Plaintiffs,

9 vs.

10 CORECIVIC, INC.,

11 Defendant.

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13
14 REMOTE DEPOSITION OF
15 RUSSELL WASHBURN

16 Lumpkin, Georgia

17 Wednesday, December 1, 2021

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24 Court Reporter: Michelle M. Boudreaux-Phillips, RPR

25 TSG Job No. 201678

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6 December 1, 2021

7 10:01 a.m.

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10 Remote deposition of RUSSELL WASHBURN,
11 conducted at the location of the witness in
12 Lumpkin, Georgia, pursuant to Agreement,
13 before Michelle M. Boudreaux-Phillips, a
14 Registered Professional Reporter in the State
15 of Georgia.

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1 APPEARANCES

2 (Via Zoom)

3

4 On behalf of the Plaintiffs:

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14 On behalf of the Defendant:

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18

19 Also Present: Jackie Aranda Osorno, Esq.
20 Meredith Stewart, Esq.

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1 RUSSELL WASHBURN

2 A Understood.

3 Q A question we ask of all witnesses, are you
4 taking any medication or is there any other reason you
5 can't give your best testimony today?

6 A No, there's no reason.

7 Q Terrific.

8 So you understand you're here to give
9 testimony on behalf of CoreCivic as CoreCivic's
10 designated witness on a variety of topics relating to a
11 lawsuit filed against CoreCivic in April 2018 relating
12 to detainees at the Stewart Detention Center in a
13 voluntary work program, correct?

14 A Yes, sir.

15 Q When did you first learn about the lawsuit
16 itself?

17 A Let's see. I arrived in April of 2020,
18 April 1st. I can't pinpoint the exact date. It would
19 have been sometime shortly thereafter, but to recall a
20 specific date, I really can't. I know it probably came
21 by way of a request for documents, but even that, it
22 would be specification. I suspect that's probably when
23 I became aware, when there was a request for documents
24 pertaining to this specific case

25 Q And that was after you'd already started as

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2 warden at Stewart in April of 2020?

3 A Yes, sir.

4 Q Did you have any conversation, as part of the
5 onboarding process coming in as the warden at Stewart,
6 with anyone about the lawsuit?

7 A No, not prior to the request for documents.

8 Q Other than the request for documents, did you
9 have any conversations -- and I'm not going to ask for
10 content yet -- with anyone about the lawsuit?

11 A Outside of my lawyers or attorneys?

12 Q Well, put aside -- outside of your
13 preparation for this deposition, from the time you
14 joined Stewart, you came onboard as warden at Stewart
15 in April of 2020, up until you started preparing for
16 this deposition, did you have any conversations with
17 anyone about the lawsuit?

18 A Yeah, I was -- I had conversations with the
19 attorneys as they were requesting specific documents,
20 and that conversation would have been more specifically
21 to the types of documents that they were requesting for
22 this lawsuit.

23 Q Other than the lawyers requesting documents
24 for the lawsuit, did you have any substantive
25 conversations with anyone about the allegations in the

1 RUSSELL WASHBURN

2 Center in April of 2020. And I hope I --

3 Q And to whom do you report now as warden of
4 Stewart Detention Center?

5 A Charles Keeton, K-E-E-T-O-N. He is the
6 managing director.

7 Q Managing director for what?

8 A Our Division II.

9 Q And what does Division II comprise?

10 A I believe there's seven facilities -- or six
11 now, six total facilities.

12 Q Those are all ICE detention centers?

13 A Yes, I do think that some of them are ICE and
14 house marshals; and one of them, I know for sure, maybe
15 two of them, have a little small county jail attached
16 to them as well.

17 Q And is Mr. Keeton at the FSC?

18 A Yes.

19 Q By the way, just to again complete the
20 record, what is your educational background? You have
21 a background in corrections?

22 A Yes. I went through high school, and then I
23 went through the accredited academy in the state of
24 Florida, so I'm a certified officer in the state of
25 Florida. Assumed some college credits through that

1 RUSSELL WASHBURN

2 CoreCivic would not enter into a contract with
3 financial terms where you would lose money or break
4 even, correct?

5 A Not that I'm aware of, no.

6 Q And what I'd like to know is -- scrolling
7 back -- for the Tier 2, for beds 1601 to 1750, at that
8 bed day rate of 61.85 or net \$61, what is the profit
9 margin to CoreCivic from that bed rate?

10 A At that time -- I don't know what it would
11 have been at that particular period of time.

12 Q All right, so we'll get to the rates that are
13 in effect now, and I'll be asking the same question.

14 Same thing, for the \$40 rate, that tier, do
15 you know what the profit margin is there?

16 A Yes. I think it averages about 28 percent.

17 Q That \$40 rate for beds 1751 and above is
18 still in effect today, correct?

19 A Yes.

20 Q And you're telling me that at that \$40 rate,
21 which is net \$39 per detainee per day to CoreCivic, you
22 have a 28 percent profit margin?

23 A Again, I have not been to that number, just
24 by budget projections, which is established on that
25 1600. So I'd have to get the budget sheet and then

1 RUSSELL WASHBURN

2 look at those numbers and how they would adjust. I can
3 only answer for what the current budget has in place.

4 Q Okay. And it would be 28 percent profit
5 margin?

6 A I believe that's what we're averaging, yes.

7 MR. HOWARD: Well, let's take a look at
8 the current modification so we can talk in
9 terms of the current numbers. And if we
10 could pull up STEW0050, the September 2020
11 modification.

12 THE WITNESS: And I don't need it now,
13 but maybe in the next 15 minutes or so for a
14 restroom break.

15 MR. HOWARD: Why don't we do it now
16 while she's pulling up the document.

17 THE WITNESS: I'm good. I just don't
18 want to interrupt the train of thought, so...

19 (Exhibit 4 marked for identification.)

20 Q (By Mr. Howard) All right, so I'm showing
21 you now Exhibit 4. This is another modification of the
22 ICE contract. And, again, the date of this is -- I'm
23 sorry, it's not -- up there -- we can scroll down. I
24 believe it's September 25th, 2020. Yeah, that's the
25 date it was signed by Joseph Williams. By the way, do

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2 Q And those will increase if you can reduce
3 costs or increase revenues, simple accounting?

4 A Yeah, I think it's simple business. Yes.

5 Q Okay. And as part of the budgeting process,
6 does CoreCivic look to identify areas where it can, you
7 know, improve its bottom line, that is, make more
8 money?

9 MR. LEE: Object to form. Beyond the
10 scope.

11 THE WITNESS: The answer, I mean, for us
12 to -- as a business practice, do we look for
13 opportunities to be able to provide the same
14 level of service without compromising safety
15 and security and still yield a savings, the
16 answer to that question would be yes, but it
17 would not be at the compromise of the safety
18 and security of the facility.

19 MR. HOWARD: Absolutely.

20 Q (By Mr. Howard) And the -- certainly the
21 revenue, at least in this time when you're perpetually
22 below the 1600 minimum, is pretty much tapped, there
23 aren't going to be ways for you to really increase your
24 revenue, correct?

25 A Yeah, no, not to increase it, that's correct.

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2 Q So there would be focus to improve your net
3 earnings on cost items, correct?

4 MR. LEE: Object to form. Beyond the
5 scope.

6 THE WITNESS: Again, I think I -- I
7 mean, kind of the same --

8 MR. HOWARD: Same answer, right?

9 THE WITNESS: Yeah, I think -- yeah.

10 Q (By Mr. Howard) If you can reduce your costs
11 while maintaining the security and safety and the
12 conditions of the facility, you'll do that because it
13 will mean more money for CoreCivic?

14 MR. LEE: Object to form, asked and
15 answered, beyond the scope.

16 Q (By Mr. Howard) You can answer again. I'm
17 sorry.

18 A I'm sorry. Same answer. Sorry.

19 Q Okay. Now, when you get the budget from FSC,
20 who at CoreCivic, at Stewart, examines the line items
21 to determine "this is too high, this is too low, or
22 maybe we can save money here," does that kind of line
23 item inspection, if anyone?

24 A We do. It would be, of course, the business
25 manager here at the facility, the assistant warden,

1 RUSSELL WASHBURN

2 Q Okay. Let's look at page 5 of this document.
3 All right, so according to Mr. House's email,
4 this is the staffing plan proposed by CoreCivic for
5 Stewart in 2017, and we're going to look at the "Type
6 of Position" and "Number of Position" columns. Do you
7 see those?

8 A I do.

9 Q Okay. Do you see the "Detention Officer"
10 row?

11 A I do, yes, ma'am.

12 Q Okay. So in March 2017, CoreCivic, according
13 to this document, proposed 271 detention officers at
14 Stewart?

15 A Yes, I see that.

16 Q Do you have any idea how many detention
17 officers were employed at Stewart before 2017?

18 A Without looking at the records, no.

19 Q Okay. And then scrolling down a little bit
20 to "Senior Detention Officer," CoreCivic proposed 18.
21 Do you see that?

22 A I do, yes, ma'am.

23 Q Okay. And then -- we're jumping around, I
24 apologize -- janitors, CoreCivic proposed 0.5. Do you
25 see that?

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2 A I do, yes, ma'am.

3 Q And do you read that to mean one half-time
4 janitor?

5 A Yes, part time.

6 Q Okay. Stewart -- is one part-time janitor
7 enough to clean the whole facility of Stewart?

8 A Again, this is not a typical -- I mean, this
9 is a budgetary review. It depends on how many days
10 you're covering because that .5, you know, if you're
11 covering seven days a week, you know, for 40 hours,
12 that 0.5 could be more than.

13 I suspect, just based off of this, it's
14 probably one person part time, but -- based on the
15 overall salary, I would suggest that, but we actually
16 have -- the janitor service is really provided for the
17 outside building where ICE -- the construction. So the
18 janitorial services that are being provided primarily
19 are over in that particular location. So in that case,
20 yes.

21 Q Okay. So the janitors paid by CoreCivic
22 primarily only clean the portion of the facility that
23 is the ICE offices and ICE courtroom; is that right?

24 A Right, outside of the secured parameters.

25 Now, they do also clean and have been cleaning, since

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2 COVID, other areas in addition to, but -- but yes.

3 Q Prior to COVID, the rest of the facility was
4 cleaned almost entirely by detained workers, right?

5 A I'm sorry, you broke up.

6 Q Prior to COVID, the rest of the facility was
7 cleaned almost entirely by detained workers?

8 MR. LEE: Object to form.

9 THE WITNESS: No, I would say, I mean,
10 staff -- staff and detainee workers would
11 have been providing that service. Example, a
12 control room, a detainee is not able to go
13 inside of a control room, so that service
14 would have been provided and cleaned by the
15 actual officers that are assigned.

16 So I won't say exclusively. There were
17 certainly janitorial services being performed
18 by detainees, but not exclusively.

19 MS. SANDLEY: Okay.

20 Q (By Ms. Sandley) This staffing plan, if you
21 know, is -- is it based on a 1600 population?

22 A As part of the contract -- again, what is the
23 date on this email?

24 MS. SANDLEY: Let's look at page 2,
25 Jackie.

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2 THE WITNESS: I see the 2017.

3 MS. SANDLEY: Yeah.

4 THE WITNESS: So I believe the 1600 or
5 the expansion was in 2016, so I think it's
6 safe to say that, yes, this would be based
7 off of a 1600 guarantee.

8 MS. SANDLEY: Okay. And let's go back
9 to page 5.

10 Q (By Ms. Sandley) All right, so looking at
11 "Maintenance," this staffing pattern allows for one
12 maintenance supervisor. Do you see that?

13 A Yes, I do.

14 Q And four maintenance workers?

15 A I do.

16 Q Do you see any food-service staff included in
17 this staffing plan?

18 A No, because they're contracted, so they would
19 be under a separate contract for us. They would not be
20 on our staffing plan. They would be through the
21 contract between us and Trinity.

22 Q Okay. All right.

23 Do you know if this specific staffing plan
24 was incorporated into the Stewart IGSA?

25 A Based off of the documents I reviewed in this

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2 the higher and greater band, but it's not
3 captured into that per diem rate because the
4 1600 contract is the one that we actually are
5 paid for.

6 Q (By Ms. Sandley) Generally, comparing the
7 1600 to 1752 staffing plans, where are the differences?
8 So, for example, are there more detention officers in
9 the 1752?

10 A There is. I'd have to go back and look at
11 the number. That's the biggest variance, is in the
12 detention officers. And like an example, you saw there
13 was only a maintenance supervisor and four workers. We
14 have an assistant maintenance supervisor as well that's
15 not captured in there. So there's a few others, but
16 primarily in security is where you're going to see the
17 big difference.

18 Q Okay. And are there more supervisor-level
19 positions in the 1752?

20 A I believe so in medical. There might be one
21 additional clinical supervisor that's not captured and
22 maybe even one assistant because we have two assistant
23 HSAs. I'd have to go back and again look at the
24 staffing pattern, but -- to see if it calls for two or
25 one, but we actually have two. For some reason, I

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2 Q Is this form used at Stewart?

3 A Yes, I believe it is.

4 Q Okay. And here it says, "Compensation will
5 be from \$1 to \$3 per day."

6 Stewart currently pays people up to \$4 per
7 day, right?

8 A Yes, ma'am. For a few positions, yes.

9 Q Okay. So fair to -- has this form been
10 modified over time?

11 A It does not appear it's been updated.

12 Q Well, it's possible this is an out-of-date
13 form, so I think I'm asking do you know if there's a
14 more recent form?

15 A I don't know, but it's equally possible it
16 just hasn't been updated to reflect that new rate.

17 Q Okay. This form does not mention the PBNDS
18 limit to one work detail per day, does it?

19 A It does not.

20 Q Okay. And let's take this form down.

21 How -- are detained workers at Stewart
22 informed of how to quit the work program?

23 A I'm not sure if it's referenced in the
24 detainee handbook or not. I believe it is, but I'm
25 not -- I can't remember off the top of my head. I'd

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2 Q Okay. That was my next question. Can we
3 call them the PRR for short?

4 A Yes, we can.

5 Q All right. And what are the PRR?

6 MR. LEE: Object to form. Exceeds the
7 scope of the notice.

8 THE WITNESS: It's ICE's pandemic
9 response requirements for the COVID -- due to
10 COVID-19.

11 Q (By Ms. Sandley) And there have been several
12 versions of the PRR released since the beginning of the
13 pandemic, correct?

14 A Yes, ma'am.

15 MR. LEE: Object to form. Exceeds the
16 scope.

17 Q (By Ms. Sandley) Is Stewart expected to
18 comply with PRR?

19 A Yes, we are required to comply --

20 MR. LEE: Object to form. Exceeds the
21 scope. Counsel, there's nothing in the
22 notice about the PRR.

23 MS. SANDLEY: There is something in the
24 notice about ICE policies relating to the
25 work program and policies in effect at

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2 "Facilities are encouraged to prohibit or, at a
3 minimum, significantly adopt restricted visitation
4 programs, and to suspend all volunteer work assignments
5 for detainees assigned to food service, and other
6 assignments where applicable." Do you see that?

7 A I do see it.

8 Q Did Stewart suspend all volunteer work
9 assignments for detained people assigned to food
10 service?

11 A We did not.

12 Q Did Stewart suspend work assignments for
13 other detained worker assignments at Stewart?

14 A We did not.

15 Q Okay. And then let's go to the next exhibit.
16 (Exhibit 25 marked for identification.)

17 Q (By Ms. Sandley) This is actually going to
18 be PRR Version 7. And while we pull this up, do you
19 know which version of the PRR is currently in effect?

20 A 10/19, the one dated 10/19, I believe.

21 Q All right. And this is Exhibit 25. Let's
22 scroll down so you can see the date. So this is the
23 10/19/2021 version of the PRR?

24 A Yes, ma'am.

25 Q And this is currently in effect at Stewart?

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2 A Yes, ma'am.

3 Q Okay, let's go to PDF page 37.

4 Warden, do you see where we've highlighted

5 it says, "Facilities are required to suspend all

6 volunteer work program assignments for detainees

7 assigned to food service and other VWP assignments,

8 where applicable, that require individuals to interact

9 with each other at distances of less than six feet.

10 Any detainee participating in a VWP assignment is

11 required to wear appropriate PPE for the position at

12 all times (e.g., disposable gloves, masks, goggles).

13 Detainees in isolation or quarantine may not be

14 assigned to a VWP detail"?

15 Are people -- are detained people at Stewart

16 currently working in the kitchen?

17 A Yes.

18 Q Are detained people at Stewart currently

19 working in jobs that require interaction at less than 6

20 feet?

21 A I mean, I would say at times they're probably

22 less than 6 feet.

23 Q Who's been doing the barbering at Stewart

24 since April 2020?

25 A Detainees.

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2 Q And would you agree that barbering requires
3 interaction at less than 6 feet?

4 A Yes. And I will say, too, that the detainee
5 barber and the detainee receiving the barbing service
6 wear applicable and required PPE.

7 Q Okay.

8 MS. SANDLEY: Let's take this exhibit
9 down.

10 Q (By Ms. Sandley) Is the typical kitchen
11 shift at Stewart between 6 and 10 hours?

12 A Between 6 a.m. and 10 p.m. or --

13 Q No, between 6 and 10 hours long.

14 A As far as the shifts?

15 Q Uh-huh.

16 A We don't have any shifts that go into 10
17 hours.

18 Q How long are shifts in the kitchen typically?

19 A I think they're scheduled, I believe -- and I
20 have to look back at the schedule -- I believe eight
21 hours. Certainly less than eight hours. Eight hours
22 or less.

23 Q Okay. And do you know how long kitchen
24 shifts were prior to your time at Stewart?

25 A Not without looking at the record.

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2 down.

3 Q (By Ms. Sandley) Warden, are you familiar
4 with the Trinity contract?

5 A I won't say I'm fluent. I have seen it, yes,
6 but I won't say I'm fluent.

7 Q Did you review it in preparing for this
8 deposition?

9 A Briefly, yeah.

10 Q The Trinity contract requires CoreCivic to
11 provide a specific number of kitchen workers in the
12 kitchen, correct?

13 A I believe so, yes.

14 Q Okay. And then CoreCivic in turn sets the
15 number of kitchen workers in that Policy 18-100CC that
16 we looked at earlier, correct?

17 A Yes, ma'am.

18 MR. LEE: Object to form.

19 THE WITNESS: Sorry.

20 Q (By Ms. Sandley) And does CoreCivic set that
21 number of kitchen workers in Policy 18-100CC to help
22 ensure that it meets the number of kitchen workers it's
23 required to provide under the Trinity contract?

24 MR. LEE: Object to form.

25 THE WITNESS: That's factored in. I

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2 facility to fall to that level. So I can't
3 answer that question because I wouldn't allow
4 it to get there.

5 Q (By Ms. Sandley) And if CoreCivic fell below
6 those cleanliness and sanitation standards that it's
7 required to comply with per its contract, it could be
8 found in violation of its contract, correct?

9 A That's correct, if it fell below the
10 standard, yes.

11 Q Okay. Is there any portion of PBNDS that
12 prohibits CoreCivic staff from performing barbering?

13 A I don't believe so.

14 Q Have CoreCivic staff ever barbered at
15 Stewart?

16 MR. LEE: Object to form.

17 THE WITNESS: Not since I've been here.

18 I don't recall ever reading of such.

19 MS. SANDLEY: Okay.

20 Q (By Ms. Sandley) CoreCivic has in the past
21 paid detained workers to assist other detained people
22 with disabilities at Stewart, correct?

23 A I don't know if that's correct or not. I
24 believe we have a process in place, but I don't know
25 whether we have or -- actually have or have not. I'd

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2 Q Okay. One of the witnesses in this case
3 previously testified that the FSC sets detained worker
4 wages at Stewart. Is that correct?

5 MR. LEE: Object to form.

6 THE WITNESS: I don't know where that
7 came from. No.

8 MS. SANDLEY: Okay.

9 Q (By Ms. Sandley) So that's left up to
10 Stewart staff?

11 A Correct. Typically -- I mean, obviously if
12 we're going to increase, I would have a discussion with
13 the managing director, in my case now, Charles Keeton,
14 and that's really more of an FYI, make sure that he
15 understood why we were doing what we were doing and
16 moving that process, but there's no requirement for
17 approval that I'm aware of.

18 Q Okay. But if, in the course of that
19 conversation with a managing director, he didn't agree
20 with that, he could tell you not to do it, correct?

21 A Yeah, I mean, as my supervisor, he certainly
22 could. I've never experienced that, but he certainly
23 could.

24 Q Okay. Are you aware that CoreCivic has in
25 the past provided incentives other than daily pay to

1 RUSSELL WASHBURN

2 detained workers?

3 MR. LEE: Object to form.

4 THE WITNESS: Provided in place of or in
5 addition to?

6 MS. SANDLEY: Let's start with in
7 addition to.

8 THE WITNESS: Am I aware that that has
9 been provided in the past in addition to,
10 yes.

11 MS. SANDLEY: Okay.

12 Q (By Ms. Sandley) And those other incentives
13 have included extra food?

14 A Yes.

15 Q And they've included phone time?

16 A I was not aware until earlier in the day you
17 said that -- I think it was Mr. Swinton testified
18 during his time, that's what he did, so...

19 Q And they've included extra video games and
20 movies in the designated worker housing units, correct?

21 A I would say yes. I mean, that's pretty
22 standard, yeah, so...

23 Q And the practice of offering incentives, that
24 you're aware of, applied generally to all the detained
25 workers at Stewart?

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2 anything that's not applicable to or from the PBNDS
3 standards.

4 Q So PBNDS sets out specific disciplinary
5 offenses, correct?

6 A Correct, yes.

7 Q And those are -- are there -- I just want to
8 be sure I understand your testimony. You're not aware
9 of any other rules at Stewart for which people could be
10 disciplined apart from what's in the PBNDS, correct?

11 A Correct.

12 Q Okay. And are the rules at Stewart

13 communicated to detained people?

14 A Yes.

15 Q How?

16 A That is in the detainee handbook.

17 Q Any other way they're informed about the
18 rules?

19 A Verbally, you know, through staff during the
20 intake process, the unit team's interactions on a, you
21 know, regular basis with the detainees. Because part
22 of that process, especially if there's somebody who's
23 limited in English proficiency, of course the handbook
24 is provided in the appropriate language, but through
25 interactions with staff as well.

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2 Q Disciplinary reports -- you referred to those
3 just now -- are those also called write-ups?

4 A Yeah, disciplinary reports, write-ups, DRs,
5 yes, ma'am.

6 Q Okay. And you referred to both restrictive
7 housing and segregation. Are those terms
8 interchangeable at Stewart?

9 A Really, restrictive housing is the term that
10 we have. It's bad habits of segregation, but
11 restrictive housing.

12 Q People used to call it segregation, right?

13 A Yes, ma'am.

14 Q And sometimes people still call it that,
15 right?

16 A Old habits are hard to kick, but yes.

17 Q Yeah.

18 Q Okay. Stewart has a disciplinary policy,
19 correct?

20 A Correct.

21 Q It's Policy 15-100?

22 A Yes, ma'am.

23 Q That's a CoreCivic policy?

24 A Correct.

25 Q And that policy is created by the FSC?

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2 A Correct.

3 Q And it applies to all CoreCivic staff at
4 Stewart?

5 A It does, yes.

6 Q Does CoreCivic have to notify ICE of the
7 results of disciplinary proceedings?

8 A Not the results, no.

9 Q Does CoreCivic have to notify ICE if someone
10 is sent to disciplinary segregation?

11 A Yes.

12 Q Is that notification to ICE required just
13 once, or is there a periodic notification as long as
14 that person is in segregation?

15 A We make notification, but they actually
16 participate in the weekly restrictive housing committee
17 reviews. So they go through every person that's
18 currently residing in restrictive housing, discuss them
19 individually, and then are part of the discussion about
20 what's the appropriate method for either releasing the
21 person, continuing them in restrictive housing, as well
22 as mental health is involved with that committee as
23 well. So we're evaluating them exclusively not only
24 for security side, but the medical side, and having ICE
25 involved in that conversation, and that happens every

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2 training. And, like I said, it's a highlight
3 of the curriculum, the policies, and the
4 standards, but not specific to every
5 scenario, no.

6 MS. SANDLEY: Okay.

7 Q (By Ms. Sandley) And CoreCivic staff are
8 expected to implement the discipline policy uniformly
9 across the facility, right?

10 A That's correct.

11 Q And as far as CoreCivic knows, that's what's
12 happening at Stewart; is that right?

13 A That's correct.

Term	Percentage (%)
GDP	95
Inflation	92
Interest rates	90
Central bank	88
Monetary policy	85
Quantitative easing	82
Institutional investors	80
Fintech	78
Algorithmic trading	75
Blockchain	72
Smart contracts	68
Initial coin offerings	65
Crowdfunding	62
Robo-advisors	60
Digital currencies	58
Regulatory沙盒	60
FinTech hubs	55
RegTech	52
InsurTech	50
Neobanks	48
Digital identity	45
Regulatory沙盒	42
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11 this exhibit down.

12 Q (By Ms. Sandley) Are you aware that there
13 have been instances at Stewart when detained people
14 were disciplined for refusing to work?

15 MR. LEE: Object to form.

16 THE WITNESS: In what period of time?

17 MS. SANDLEY: During the relevant period
18 for this case.

19 THE WITNESS: Without seeing the
20 document, no.

21 Q (By Ms. Sandley) You're not aware?

22 A No.

23 Q Okay. Are you aware that people detained at
24 Stewart have been disciplined for asking for the pay
25 they were promised?

1 RUSSELL WASHBURN

2 the number of quarantine pods, cohort pods, and the
3 requirement to keep everybody separated and still
4 access those yards.

5 Q Before COVID, would two hours per day of
6 recreation time five days a week have been less than
7 what is offered in general population?

8 A Yes, it would have been less than.

9 Q Okay. And the property that people detained
10 in segregation are allowed to have is limited, correct?

11 A For disciplinary, yes. For administrative,
12 no.

13 Q The items people in segregation can purchase
14 in commissary are limited, correct?

15 A Again, for administrative, I don't believe
16 so. Disciplinary, yes, but not for administrative.

17 Q And phone access in segregation is limited,
18 correct?

19 A For disciplinary.

20 Q Okay, so it's less than what they would have
21 in the general population, correct?

22 A Correct.

23 Q And what is law library access in segregation
24 like at Stewart?

25 A Well, we have a law library in restrictive

C E R T I F I C A T E

4 STATE OF GEORGIA

5 COUNTY OF COBB

7 I, MICHELLE M. BOUDREAUX-PHILLIPS, do hereby
8 certify that RUSSELL WASHBURN, the witness whose
9 deposition is hereinbefore set forth, was duly sworn by
10 me and that such deposition is a true record of the
11 testimony given by such witness.

13 I further certify that I am not related to
14 any of the parties to this action by blood or marriage
15 and that I am in no way interested in the outcome of
16 this matter.

18 IN WITNESS WHEREOF, I have hereunto set my
19 hand this 13th day of December 2021.

MICHELLE M. BOUDREAUX-PHILLIPS, RPR